

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

344 PROVIDENCE ROAD REALTY	:	
TRUST, RICHARD J. WUNSCHEL,	:	
and NAUTILUS INSURANCE COMPANY,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	CIVIL ACTION NO.: 04-40197-FDS
	:	
AMERICAN SAFETY RISK RETENTION	:	
GROUP, INC. and ARCHITECTURAL	:	
DELEADING, INC.,	:	
	:	
Defendants	:	
	:	

**JOINT MOTION OF THE PARTIES
TO EXTEND THE TIME FOR INITIAL DISCLOSURES**

The plaintiffs, 344 Providence Road Realty Trust, Richard Wunschel, and Nautilus Insurance Co., and the defendants, American Safety Risk Retention Group, Inc., and Architectural Deleading, Inc., hereby join together to request that this Court extend the deadline for completing initial disclosures under Federal Rule of Civil Procedure 26.1(a) to April 29, 2005.

As grounds for this motion, the parties state:

1. The parties are in the process of completing the necessary discovery, and require additional time to do so.
2. This is the first request for an extension of time and the parties do not request the extension of any other deadlines.
3. No party will be prejudiced by the delay and all parties agree to the extension.

WHEREFORE, for good cause shown and in the interests of justice and judicial economy, the parties respectfully request that the time for completing initial disclosures be extended to April 29, 2005.

ARCHITECTURAL DELEADING, INC.,
AS DEFENDANT AND NOT AS
DEFENDANT IN CROSS-CLAIM

By its attorneys:

MORRISON MAHONEY LLP

/s/ John F. Burke, Jr.

John F. Burke, Jr.
BBO No. 065140
1500 Main Street, Suite 2400
P.O. Box 15387
Springfield, MA 01115
(413) 737-4373

The defendant,

AMERICAN SAFETY RISK RETENTION
GROUP, INC.

By its attorneys:

CLARK, HUNT & EMBRY

/s/ William J. Hunt

William J. Hunt
BBO No. 244720
Armando Acosta
BBO No. 648242
55 Cambridge Parkway
Cambridge, MA 02142
(617) 494-1920

The plaintiffs,

344 PROVIDENCE ROAD REALTY TRUST,
RICHARD WUNSCHEL, and NAUTILUS
INSURANCE COMPANY

By their attorneys:

SMITH & DUGGAN LLP

/s/ Christina Schenk-Hargrove

Matthew J. Walko
BBO # 562172
Christina Schenk-Hargrove
BBO # 645164
Two Center Plaza, Suite 620
Boston, MA 02108-1906
(617) 228-4400

Dated: April 21, 2005

CERTIFICATE OF SERVICE

The undersigned certifies service of the foregoing on April 22, 2005, in accordance with Federal Rule of Civil Procedure 5(b)(2)(D) and United States District Court for the District of Massachusetts Electronic Case Filing Administrative Procedure § E(2) as all parties, having appeared in this action through counsel admitted to practice before this Court, have been identified by the Clerk as receiving Notice of Electronic Filing.

/s/ Christina Schenk-Hargrove
Christina Schenk-Hargrove (BBO No. 645164)